

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re:

City of Detroit, Michigan,

Case No. 13-53846  
Honorable Thomas J. Tucker  
Chapter 9

Debtor,

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**NOTICE OF APPEAL AND STATEMENT OF ELECTION**

**Part 1: Identify the appellant(s)**

1. Name(s) of appellant(s): B & C LAND DEVELOPMENT CORPORATION
2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:  
For appeals in an adversary proceeding.  
 Plaintiff  
 Defendant  
 Other (describe) \_\_\_\_\_
- For appeals in a bankruptcy case and not in an adversary proceeding.  
 Debtor  
 Creditor  
 Trustee  
 Other (describe) Respondent \_\_\_\_\_

**Part 2: Identify the subject of this appeal**

1. Describe the judgment, order, or decree appealed from: Order Granting City of Detroit's Motion for Entry of an Order Enforcing the Plan of Adjustment Injunction
2. State the date on which the judgment, order, or decree was entered: 8/5/2015

**Part 3: Identify the other parties to the appeal**

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys (attach additional pages if necessary):

1. Party: B&C Land Development Corporation Attorney: Horace D. Cotton (P33268)  
P.O. Box 19520  
Detroit, MI 48219  
(313) 595-1517
2. Party: City of Detroit Attorney: Mark N. Swanson  
350 W. Jefferson, Suite 2500  
Detroit, MI 48226  
(313)496-7591

**Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)**

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

**Part 5: Sign below**

**/s/ Horace D. Cotton**

Date: 08/19/2015

Signature of attorney for appellant(s) (or appellant(s) if not represented by an attorney)

Name, address, and telephone number of attorney  
(or appellant(s) if not represented by an attorney):

Horace D. Cotton (P33268)

P. O. Box 19520

Detroit, MI 48219

(313 595-1517)

Fee waiver notice: If appellant is a child support creditor or its representative and appellant has filed the form specified in § 304(g) of the Bankruptcy Reform Act of 1994, no fee is required.